

1 UNITED STATES DISTRICT COURT  
2 NORTHERN DISTRICT OF CALIFORNIA

3 IN RE TEZOS SECURITIES LITIGATION

Master File No. 17-cv-06779-RS

4 **CLASS ACTION**

5 This document relates to:  
6 ALL ACTIONS.

7 **[PROPOSED] ORDER GRANTING  
8 MOTION TO STAY THE *BAKER*  
9 ACTION**

10 Having considered the motion of Lead Plaintiff Arman Anvari for an order staying *Baker v.*  
11 *Dynamic Ledger Solutions, Inc., et al.*, No. 3:17-cv-06850-RS in the event that the action is remanded  
12 (the “Motion”), and good cause appearing therefor,

13 IT IS HEREBY ORDERED that the Motion is granted; and

14 IT IS FURTHER ORDERED that plaintiff Andrew Baker in the remanded case *Baker v.*  
15 *Dynamic Ledger Solutions, Inc., et al.*, No. CGC-17-562144 pending in the Superior Court of the  
16 State of California, for the County of San Francisco (“*Baker* Action”), and all persons, agents,  
17 representatives or employees acting in concert with plaintiff Baker are hereby enjoined from  
18 prosecuting any claims arising out of or relating to the initial coin offering (“ICO”) conducted by,  
19 *inter alia*, Dynamic Ledger Solutions, Inc., Tezos Stiftung, Kathleen Breitman, Arthur Breitman,  
20 Timothy Cook Draper, Draper Associates V Crypto LLC and Bitcoin Suisse AG in July 2017; and

21 IT IS FURTHER ORDERED that the Superior Court of the State of California for the County  
22 of San Francisco is enjoined from proceeding with the *Baker* Action other than for administrative  
23 purposes; and

24 IT IS FURTHER ORDERED that this injunction and restraint will continue in effect until  
25 further action or order of this Court or the entry of final judgment of this class action.

1 SO ORDERED

2 Dated: \_\_\_\_\_, 2018

3  
4 THE HONORABLE RICHARD SEEBORG  
5 UNITED STATES DISTRICT JUDGE  
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